

1 Q Were you involved in any aspect of the paper work
2 that led to the hiring of any of the subcontractors or payment
3 of the subcontractors?

4 A I took care of the asbestos testing and removal and
5 the lighting grid -- redo the lighting grid and some other
6 things through Jane. Jane and I did the paper work on that.

7 Q And this is what, scattered in time and could you
8 give me a time frame for when these things were done?

9 A Probably the end of '91, first part of '92, I
10 believe. I believe that's right. The first part of '92, for
11 sure, because we finished everything in June.

12 JUDGE CHACHKIN: Of what year?

13 MR. McCLELLAN: Of -- I'm sorry. In June of '92 is
14 when we started doing programming. In June of '92.

15 BY MR. SHOOK:

16 Q Now, when did studio construction commence?

17 A When did it begin -- actually begin?

18 Q Right.

19 A Well, the building itself was being restructured and
20 it was already -- there was not an office. When I first came,
21 there was one room, the master control area that was being
22 used and so it began then and we've -- actually we're still
23 finishing some final things. The air conditioning was -- he
24 goofed that up, too, and so we had to redo part of the air
25 conditioning.

1 Q But you never saw -- you never saw a contract that
2 involved National Minority and Mr. Muncie?

3 A No. I'm sorry. I did not. Jane would've taken
4 care of all that.

5 Q As station manager, you didn't have authority to get
6 rid of him or to fire him?

7 A No, because I didn't hire him. I had nothing to do
8 with him. I basically -- I was going up there to set up the
9 station and hire people and whatever else and he was supposed
10 to have had the -- he promised me what he was -- he told me
11 what he was doing and we went through the plans and he told me
12 what was happening, but it didn't happen.

13 Q Were you ever involved in any way in the
14 construction of a studio for a TBN owned and operated station?

15 A No. I'd never been.

16 Q Now, in Paragraph 19 of your testimony, focusing on
17 the last sentence where it talks about, "I had a sense of
18 urgency about the studio since I knew that most of our plans
19 and the plans that were closest to my heart," et cetera --
20 now, when you talk about most of our plans, what is it that
21 you're referring to?

22 A When Jane and I met and after I knew I was hired,
23 she gave me a training session, what I would be doing at the
24 station, that I'm minority programming, and basically we had a
25 kind of a three-prong programming that we would do. We would

1 do -- first of all, we would try to hire people from minority
2 community, develop and train them, give them opportunities to
3 advance, and then another part of it would be to do minority
4 programming for the minorities with using minority people in
5 dealing with minority issues.

6 And the third part, of course, was to preach the
7 gospel and do the scriptural kinds of things, His Hand
8 Extended and the prayer and all those kinds of things. So
9 that was kind of the goal. I was hungry to get on the air and
10 start doing some local programming and begin administering to
11 the needs of people. So those were the plans that we
12 originally talked about. Those were the plans I was trying to
13 institute.

14 Q So in other words, the "... most of our plans and
15 the plans that were closest to my heart" are the programming
16 plans essentially that you're talking about?

17 A To reach the minority community. My background is
18 in the minority community. I grew up in the minority
19 community. I've had a heart for minorities, have been on the
20 boards of a number of minority organizations, so I was really
21 excited for the opportunity to develop some rapport and I'm on
22 the Metropolitan Human Rights Commission. I'm on the board of
23 a drug and alcohol program, on the board of an intercity
24 functioning ministry.

25 So we were doing that, we'd work with the Urban

1 League and we were doing those programming things we wanted to
2 do, finally now that we can do programming. So we were on
3 course doing what we planned to do in the beginning.

4 Q In your conversations with Jane, I take it you made
5 it clear that these programming plans were being delayed as a
6 consequence of the failure of Mr. Muncie to complete the
7 studio in a timely fashion?

8 A Yes.

9 Q And what response did you get to that?

10 A She was -- always would call me down and say that
11 we're working on it and that he's very busy and he's working
12 on it. He's telling -- Mr. Muncie was telling her one thing
13 and telling -- and he had excuses for everything and he was
14 also bringing everything under budget. He looked really good,
15 but it was because he wasn't paying people and he was doing
16 the lowest bid and so then we were replacing things that
17 needed to be done. So as I said, I have a reputation of being
18 -- of sometimes complaining about things and being
19 overemotional about things and I think that some people felt
20 like maybe I was just anxious to do programming.

21 Q During the period of time that -- prior to the
22 completion or should I say the production in Portland of Joy,
23 did any NMTV director come up to Portland to look at the
24 progress and either verify or dispute what it was you were
25 telling Jane about the situation relative to the studio?

1 A I don't remember exactly. Jane did come up at one
2 time and met with -- I don't remember the date or when that
3 was though. I don't know if it was during that same time,
4 that construction.

5 Q Well, I mean, the focus of my question -- the point
6 of my question is whether anybody from the board of National
7 Minority came up to look at the studio situation and find out
8 whether the situation was as grim as you portrayed it or
9 whether there was, you know, real progress and that your
10 concerns shouldn't, you know, weigh heavily in their
11 consideration of what to do.

12 A I believe Mr. Muncie convinced them that I was just
13 complaining, that everything was moving on course, and that we
14 had some slow-downs and that everything was fine.

15 Q Would you read Paragraph 20 to yourself?

16 A 20?

17 Q Yes, sir. It begins on Page 13 and carries over to
18 Page 14.

19 A Yes, sir.

20 Q I'd like you to focus your attention on the last
21 sentence of Paragraph 20, in particular, the word "we" which
22 appears in the middle of that sentence. If you could tell me
23 what the "we" refers to.

24 A I meant we at the Portland station.

25 Q Now, does that "we" essentially mean then you?

1 A Well, me and my chief engineer. We knocked out the
2 wall so that we had to put a door in there.

3 Q So the "we" there essentially refers to you and Mr.
4 Fountain?

5 A Probably. Yes. We knocked down -- and then we had
6 a contractor come in and he rebuilt it. But this was after
7 Mr. Muncie was gone. I think I was referring to we at the
8 Portland station.

9 Q And the references in Paragraph 20 to contractor,
10 that all those references are to Mr. Muncie?

11 A Yes.

12 Q And the other contractor, which is referenced in the
13 last sentence of Paragraph 20, who is that?

14 A The gentleman that actually did it was Anderson Door
15 and they work with us on our locks and our doors. In fact,
16 they just did our ADA ramps for our handicapped -- new ADA
17 regs. He does those kinds of things and he did that for us,
18 put the door in.

19 Q By Anderson Door, that's the name of a company?

20 A Yes. I'm sorry. Anderson Door Company and his name
21 is Anderson. But it's a company. He's got a number of
22 employees.

23 Q Did you make the contract with the Anderson Door
24 company?

25 A Yes, I did.

1 Q Was that contract for an amount in excess of \$500?
2 A No. We've learned how to work around that.
3 Q Maybe so that you don't get fired, I won't ask a
4 number of questions along those lines.
5 A Yes. I'd prefer we didn't.
6 Q Do you have -- do you have a written understanding
7 with the Anderson Door Company?
8 A Yes. They're one of the companies we use on a
9 regular basis.
10 Q And this contract then, I take it, was handled in
11 Portland itself and not in California.
12 A Yes. You're right, sir.
13 Q In terms of effectuating this contract from a
14 payment standpoint, I take it purchase orders would be
15 generated in your office in Portland and then payment for them
16 would come out of California?
17 A Yes. You're right.
18 Q Could you read Paragraph 21 to yourself?
19 A Yes, sir.
20 Q Are you aware that there came a time when a petition
21 to deny was filed against the National Minority TV application
22 to acquire a full-power television station in Wilmington,
23 Delaware?
24 A Am I aware of that?
25 Q Yes, sir.

1 A Yes, I heard of it. I mean, I heard about it.

2 Q Now, can you tell me approximately when you became
3 aware that a petition to deny had been filed against the NMTV
4 application to acquire a full-power station in Wilmington,
5 Delaware?

6 A I don't remember exactly when. I remember because
7 Jane told me that it would be a National Minority station if
8 we got it and we would need to send maybe our chief engineer
9 and some other NMTV employees to help do the engineering and
10 it was on the air, but it had some problems, whatever, and to
11 kind of refit it and make it -- it would be a sister station
12 to us and we would -- I would need to send somebody to help
13 out there.

14 And so then later on, she said, "You won't be
15 needing to go," or he won't be needing to go, whoever was
16 going to go, that there's been some snags or something and I
17 think that's what our conversation was.

18 Q So at that -- it was roughly at that point that you
19 became aware that a petition to deny had been filed?

20 A I didn't -- honestly I didn't know it was a petition
21 to deny. I just know that it was not happening.

22 Q Let me put it this way. You became aware that a
23 legal challenge or challenge of some kind had been filed?

24 A Yes, sir.

25 Q And that was sometime in the summer of 1991 that you

1 became aware of that?

2 A I'm not sure of the date. But if that was the date,
3 then that's --

4 Q No, I'm just trying to see if that helps your memory
5 at all in terms of when you became aware of it.

6 A It's not something I'm remembering.

7 Q In terms of anybody traveling to the east coast, was
8 that going to be limited to Mark Fountain or were there
9 supposed to be other people involved?

10 A My understanding is what we were going to do was --
11 it was going to be Mark Norris, who is our -- was one of my
12 top air operator, and that he would be going there to man the
13 station, I think, and I'm not sure about Mark Fountain, but I
14 think it was -- he was -- he may also have been going, but
15 Mark Norris was the one I think they requested first or they
16 wanted someone to go, my best air operator to go and to help
17 kind of organize everything.

18 Q How is it that Mr. Norris was chosen?

19 A He was my most responsible and my top air operator
20 and I felt he was qualified to -- and had good experience and
21 background. It was somebody that I would feel comfortable
22 with on the road.

23 Q You had been asked by someone to make a
24 recommendation as to who should travel to --

25 A Jane Duff had asked me and I recommended Mark.

1 Q Are you aware of any connection between the filing
2 of the challenge to the NMTV acquisition of the Wilmington
3 station and progress on the construction of the Portland
4 studio?

5 A No.

6 Q So far as you know, that there's no causal
7 relationship --

8 A Not at all.

9 Q -- between the two.

10 A No.

11 Q Now, how much time elapsed from the time the program
12 Northwest Focus was conceived to the time it was first
13 broadcast?

14 A We conceived it when I first went there. We were
15 going to do a public affairs program. What we'd call it was
16 -- was up in the air. We decided on Northwest Focus and so it
17 was planned in the early days.

18 Q Well, by the early days, would you say that the idea
19 for the program Northwest Focus was essentially in place
20 before you left for Portland?

21 A Jane and I had discussed a local public affairs
22 program and so we had talked about that and that was the plan,
23 to do it in the way of production.

24 Q Who would you say conceived the idea for the program
25 Northwest Focus?

1 A I did basically. We were going to do a public
2 affairs program and it was kind of my idea to call it
3 Northwest Focus and what we would do, we would deal -- see,
4 Northwest Focus, we deal with minority issues, we have
5 minority hosts as a rule. I fill in when I need to. But
6 usually there are minority hosts. We deal with at least -- we
7 do two programs a week. One of them is usually a minority
8 issue and the other one is a general issue that would be of
9 interest to minorities as well as to the general public at
10 large.

11 Q So you would say you conceived the idea for the
12 program Northwest Focus?

13 A That part of it, yes. I would say after talking to
14 Jane and discussing it and whatever.

15 Q And that the program was conceptualized essentially
16 before you left for Portland.

17 A Yes. We had an idea -- we didn't -- we'd call it
18 Northwest Focus, but we had an idea of what we would be doing.

19 Q Right. I'm not so much worried about the name as I
20 am the concept. So the concept was in place. You and Jane
21 had talked about it before you left for Portland.

22 A Right.

23 Q Was that program -- was the program Northwest Focus
24 modeled after any program already being broadcast on any TBN
25 station?

1 A I'm not sure. They do public affairs programs, I
2 know. Every TV station has to do public affairs programs.
3 Ours is probably different than theirs, but I'm not sure what
4 theirs is like.

5 JUDGE CHACHKIN: Well, if you're not sure what
6 theirs is like, then you can't really say whether yours is
7 different or not, can you?

8 MR. McCLELLAN: Well, Your Honor, I believe because
9 we deal with the minority issues and as far as I know -- well,
10 you're right. I cannot say that for the truth. But as far as
11 I know, we are the only -- we do minority issues as a rule.
12 That's the big crux of what we do and as far as I understand,
13 from my experience working at Trinity in the past and my hazy
14 knowledge of their public affairs program, they don't really
15 push minority issues as much as we do.

16 JUDGE CHACHKIN: What do you mean when you say
17 minority issues?

18 MR. McCLELLAN: Well, having people from the
19 community come on and deal with issues like discrimination,
20 deal with particular issues like gangs, keeping kids in
21 school. The minorities have a real drop-out rate that's
22 phenomenal and so we are working with Urban League and others
23 to try to develop programs to get these kids to stay in
24 school, additional tutoring programs, project impact that I'm
25 on the board of. We deal with that specifically as alternate

1 education and gang-related programs. So we do a lot of those
2 kinds of issues.

3 BY MR. SHOOK:

4 Q Was there any particular reason why Northwest Focus
5 was the third of the three programs that had been mentioned by
6 yourself as being the local program? You recall that you
7 mentioned Joy. I think you first started to do production of
8 Joy in Portland in June of 1992. Then there was Northwest
9 Praise the Lord --

10 A No. I'm sorry. I may have thrown you a curve
11 there. We did Northwest Focus second and Northwest PTL was
12 done third.

13 Q Oh, excuse me. My notes -- you're correct. All
14 right. Let me start that over again. My premise was wrong.
15 Was there any particular reason why the Joy program was begun
16 first in June of '92 and the Northwest Focus program came on
17 in September of 1992?

18 A Yes. The reason was because I was traveling to
19 California and there was a month -- I mean, there was a week
20 of my month that was taken up and I couldn't finish my
21 construction projects, I couldn't do my community work, and so
22 we did the Joy program to keep me from having to travel back,
23 so I could focus in on the local station.

24 Q But the Northwest program had been conceived at a
25 much earlier point in time and now it was simply a matter of

1 with the studio being available and your being in Portland on
2 a full-time basis that you could actually put it into
3 implementation?

4 A Yes, sir.

5 Q Could you please read Paragraph 22 of your testimony
6 to yourself? It begins on the bottom of Page 14 and carries
7 over to Page 15.

8 A Okay, sir.

9 Q Now, after you became the station manager in
10 Portland, how were your expenses for travel, lodging, meals,
11 et cetera, paid during the period you acted as assistant
12 producer and host for the Joy in the Morning program?

13 A The tickets were sent to me from California to fly
14 there. I don't who -- how the paid thing was worked out, but
15 -- and I would stay at a hotel and my room was paid for and I
16 would eat at the hotel and that was paid for. So I don't know
17 how the expenses were divvied up or whatever, but I just took
18 my ticket, flew there, and ate, and slept, and did the shows.

19 Q So you didn't really focus on who or which entity
20 was paying for this?

21 A No. Jane told me to come, so I went.

22 Q Now, who asked you to return as an assistant
23 producer and host for the Joy in the Morning program?

24 A Jane asked me, told me that she had had a request
25 that I would do Joy and that we were going to incorporate and

1 do that.

2 Q Did she tell you from whom the request came?

3 A I don't believe she actually told me from whom the
4 request came. I imagine Paul, but I don't have anything to
5 prove that.

6 Q Mr. McClellan, could you please turn to Mass Media
7 Exhibit 383? It's in the sixth volume.

8 A And that's 383?

9 Q Yes, sir. It's the television production -- or
10 television agreement and production agreement. I'm not going
11 to ask about the agreement itself. What I want to focus on is
12 the time period here. The agreement reflects that it was made
13 January 2, 1992. Am I to understand that you did not begin to
14 act as an assistant producer and host for the Joy program
15 until after this agreement was entered into?

16 A I don't remember. I think we did -- I think we --
17 actually I was flying to California doing Joy before that
18 time, but I could be wrong. But I had an original agreement I
19 signed when I first left TBN

20 Q What agreement was that?

21 A Nobody seems to remember it. I remember signing
22 something that allowed me to do voice-overs or something and
23 it could be an updated version of this agreement or maybe it
24 -- in my mind I signed it, but I thought I had signed
25 something originally when I first left.

1 Q Are you thinking of the addendum which begins on
2 Page -- well, actually there's an acknowledgement that appears
3 on Page Seven and there's a signature down there and I take it
4 that signature is yours.

5 A Yes, I did sign this one.

6 Q And you signed this one on or about January 2, 1992?

7 A Yes, sir.

8 Q Now, there's also a first addendum which begins on
9 Page Eight -- Page Eight of the exhibit, that is. If you look
10 down, you'll see the number and a circle and --

11 A Yes.

12 Q Now, if you turn to Page Eleven, there's again a
13 place for your signature. I take it that's your signature.

14 A Yes, sir. I signed that, yes.

15 Q Now, the first addendum though, at least the copy
16 that we have, is not dated. Do you have any knowledge as to
17 when this first addendum was signed?

18 A No, I don't. But it talks about changing the
19 location to Portland, so it had to be that first part of that
20 year, I would think.

21 Q Sometime in the spring of 1992?

22 A I would think, yes.

23 Q But right now, you're not certain as to when you
24 began to -- or whether you began to fly from Portland to
25 California to act as an assistant producer and host. You

1 don't remember whether you started that before the television
2 agreement and production agreement was entered into?

3 A I don't remember the exact date. I could probably
4 look something up and find it, but I don't -- off the top, I'm
5 sorry, I don't remember.

6 Q Did you have anything to do with the preparation of
7 this television agreement and production agreement?

8 A No. I just signed it -- other than I corrected -- I
9 corrected it. They had on there that it was -- the master
10 tape was to be three-quarter inch.

11 Q And you're referring to Paragraph Two, Subparagraph
12 F, which appears on Page Two?

13 A Yes.

14 Q So that little notation referencing data and it
15 looks like there are initials. Are those your initials?

16 A Those are my initials, yes.

17 Q So approximately in January of 1992, you were given
18 this agreement to review and you made that one correction that
19 we've just noted?

20 A Yes, sir.

21 Q When you became station manager for the Portland
22 station, did you know that National Minority TV had another
23 full-power station in Odessa, Texas?

24 A Yes, I did.

25 Q Do you know or did you ever talk with a man named

1 Harold Prentis?

2 A No. That doesn't ring a bell. I'm sorry.

3 Q Do you know a person by the name of Darlene Eve?

4 A Yes, I do.

5 Q And how is it that you know her?

6 A I met her at one of the affiliates meetings.

7 Q Did you also have occasion to meet her at a National
8 Minority TV board meeting?

9 A No. I only went to one in '92 and she was not at
10 that meeting.

11 Q All right. So you met her at a station -- you met
12 her at a station managers meeting?

13 A Where the affiliates were invited.

14 Q I'd like you to turn to Mass Media Exhibit 293.

15 MR. TOPEL: It's in Volume Five.

16 MR. McCLELLAN: 293?

17 MR. SHOOK: Yes, sir.

18 BY MR. SHOOK:

19 Q Now, the point of my having you look at these
20 minutes is that if you'll notice in the first paragraph, the
21 minutes reflect that both you and Ms. Eve attended this annual
22 meeting for National Minority TV. Do you see that?

23 A Yes, I see that.

24 Q Now, after having had a chance to look through the
25 minutes, do you have any recollection of attending such a

1 board meeting with Ms. Eve?

2 A No, I don't. I don't remember that meeting at all.
3 Now, I remember requesting a four-wheel drive vehicle and I
4 remember giving a report to Jane Duff, but I don't remember
5 going to this meeting. I could've been there, but I don't
6 remember it. I have no knowledge of that meeting.

7 Q Well, to try to place this in time, you would've
8 been at the Portland station for perhaps no more than a couple
9 of weeks by the time -- at the time of this meeting and I take
10 it from the minutes here that what happened was that you flew
11 from Portland to southern California to attend this meeting.

12 A This was in conjunction with an affiliates and
13 Trinity Broadcasting Network managers meeting and so I went to
14 the managers meeting. They allowed me to, as well as the
15 other affiliates. I went to that and this meeting was held --
16 and I think originally they had mentioned my going to the
17 meeting, but instead, they took my report. So I was present
18 in the area, but I don't believe I sat in this meeting.

19 Q And you have no recollection then of actually
20 meeting or talking with Darlene Eve as a result of --

21 A Not in this meeting, but in the managers meeting.

22 Q For this year or for 19--

23 A For 1990. She might've been at the managers meeting
24 with all the other station managers that were there from all
25 the affiliates. But as far as -- I've only been to one

1 National Minority board meeting that I can recall and that's
2 in '92 and she was not at that meeting. I would have met her
3 at the TBN managers meetings and affiliate meetings, but I
4 don't remember going to this meeting. I'm sorry.

5 Q All right. Well, let's see if we can do it this
6 way. In 1990, in connection with your travel from Portland to
7 southern California, there was a station managers meeting as
8 well as the board meeting here?

9 A Yes, there was, sir.

10 Q And you have a recollection of meeting Darlene Eve
11 at the station managers meeting?

12 A Yes.

13 Q And that would've been the only occasion that you
14 met Darlene Eve?

15 A Yes. I've talked to her on the phone -- since that
16 time, I had talked to her on the phone. But this first
17 meeting her, yes, I believe was at the affiliates meeting.

18 Q That was the first time you met her?

19 A I believe so, yes.

20 Q You were introduced to each other as the respective
21 station managers of the two National Minority stations?

22 A Yes.

23 Q Now, did you ever have occasion to talk with her
24 about her experiences as the manager of the Odessa station?

25 A Yes. I believe I called her and she was helpful

1 with me -- for me. We were working on EEO, I think, the first
2 year or so.

3 Q Now, I'm not asking for figures here. Did you ever
4 have occasion to talk with her about salaries and benefits?

5 A No.

6 Q So you never compared them?

7 A No.

8 Q Did you ever compare responsibilities?

9 A No.

10 Q Did you ever talk about the number of employees that
11 each of you had?

12 A No. Not that I remember.

13 Q Did you ever talk about local programming plans?

14 A Not that I remember. I called her about the -- to
15 ask her help on some of that.

16 Q You talked about EEO?

17 A Yeah. I called her about the yearly report we put
18 out and I think I called her to ask her about doing that.

19 Q You're referring to the Commission's annual
20 employment report?

21 A Yes. Yes, sir.

22 Q But you're saying you did not talk with her about
23 programming?

24 A Not that I remember.

25 Q Did you ever talk with her about construction

1 projects?

2 A I might've complained, but I don't remember for
3 sure.

4 Q Now, in response to some questions from Mr. Cohen,
5 you had -- you testified that the Portland station does carry
6 TBN's Praise-a-thon and that that's run twice a year for a
7 week at each time.

8 A Yes, sir.

9 Q You had made some mention about eighty percent of
10 National Minority's support is generated during those two
11 Praise-a-thons. Did I understand you correctly?

12 A No. I'm sorry if I misrepresented it. Eighty
13 percent of all the money that comes in from the zip codes that
14 can be attributed to the Portland station in our ADI, eighty
15 percent of that money goes directly to National Minority
16 Television, Inc. Twenty percent goes to pay for the satellite
17 uplink and services that -- whatever other services that
18 Trinity Broadcasting Network provides NMTV.

19 Q And how is it that you're aware of eighty/twenty
20 differential that you're talking about?

21 A Jane Duff told me that.

22 Q Is the eighty percent that you referenced -- is that
23 essentially the sole -- or is that virtually the sole support
24 for the Portland station?

25 A No. We're given -- we are paid for carrying

1 programming that TBN -- people that pay TBN to be carried. If
2 they're on the Portland station, then we receive a portion of
3 that, also, and then if we generate local spots or
4 programmers, and those kinds of things are local gifts.
5 That's how they're supported.

6 Q Also, in response to some questions from Mr. Cohen,
7 you had mentioned a monthly report that goes to Jay Jones at
8 TBN What monthly report is that that you were referring to?

9 A It's a courtesy we do for them as to how many phone
10 calls we received, how many salvations, how many rededications
11 because most of our programming comes from TBN It's their way
12 of assessing how their programming is working as far as
13 ministering to people and so we, as a courtesy, send that
14 report. We use it for our files, also.

15 Q The report that you're referring to, is that
16 prepared only in connection with TBN programming or are
17 National Minority programs included in that assessment?

18 A I think that our prayer supervisor, she includes
19 everything. It just gives her an idea of the whole thing
20 because it would be too hard to separate it for hours and who
21 was working and what calls came in because there's an overlap,
22 too.

23 Sometimes there are people that are receiving it
24 right off the bird. They're getting TBN off the bird and
25 we're taking their phone calls and so it's really hard to

1 distinguish how many of them are generated from our signal and
2 how many are generated from people watching satellite or
3 whatever. We get calls from other states, too, that couldn't
4 get through the 714-731 number and we get calls from other
5 states that call us because they have our number.

6 Q How is -- do you have any knowledge as to how it is
7 they get your number if --

8 A It's on the newsletter.

9 Q Oh, it's on the -- okay. I see, I see. Now, are
10 you aware of what other companies send the report to Jay Jones
11 that we've been talking about?

12 A No, I don't. I'm not aware of that. We do it, I
13 know.

14 Q You don't know whether TBN owned and operated
15 stations send such a report?

16 A No, I don't, sir.

17 Q You don't know whether Community Educational
18 Television stations send such a report?

19 A I know nothing about that. I'm sorry.

20 Q You don't know whether Jacksonville Educators
21 Broadcasting stations send such a report?

22 A I wouldn't know.

23 Q Mr. McClellan, could you turn to Mass Media Exhibit
24 382 which appears in Volume Six?

25 A 382?

1 Q Yes, sir. First off, what I want you to focus on is
2 the first page.

3 A Yes, sir.

4 Q Can you tell me how it is that this document came to
5 be filed out? I take it that the signature I see on the
6 bottom right is yours.

7 A Yes, it is.

8 Q Can you tell me how it was that this document came
9 to be filled out?

10 A I get a manse allowance for my home and somebody
11 sent me this one and I signed it and sent it back.

12 Q Do you have any idea who it was that sent the form
13 to you?

14 A Off the top, I don't remember. It was 12/12/91, so
15 I'm not sure why this particular form was used, but that's
16 what I got, so I signed it and sent it back.

17 Q Have you filled out other such forms in the past?

18 A Yes, I have.

19 Q Do you fill out one such form each year?

20 A Yes, I do.

21 Q Now, since you've been working as station manager of
22 the Portland station, you have received one such form each
23 year?

24 A Jane sends me a form every year.

25 Q Approximately in December of each year?